

JUN 08 2012

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Article Number: 7011 0470 0002 2747 5216

Mr. Douglas S. Arnold
Alston & Bird LLP
1201 West Peachtree Street
Atlanta, Georgia 30309-3424

RE: Work Plan for Supplemental Soil and Groundwater Assessment
Electrolux, Jefferson, Iowa
IAD047055140

Dear Mr. Arnold,

In this letter we are addressing Electrolux' response to the U.S. Environmental Protection Agency's comments on the January 2012 Work Plan for Supplemental Soil and Groundwater Assessment (Work Plan) submitted to the EPA by Golder Associates. Based on our review of the Electrolux response to comments, we continue to have concerns that the proposed investigation may not fully define the nature and extent of contamination. We are including our final response to your efforts outlined in the Work Plan. Please review our response and adjust the Work Plan accordingly. We intend to review and evaluate the investigation report in light of these final comments.

If you have any questions about this letter, you may call me at (913) 551-7478 or send an email to hutchison.cynthia@epa.gov.

Sincerely,

Cynthia L. Hutchison
Waste Remediation and Permitting Branch
Air and Waste Management Division

Enclosure

cc: John A. Heer, Esq., Electrolux
Alistair Macdonald, Golder Associates
James Peace, Golder Associates
Douglas Ucci, Quantum Management Group
Dr. Cal Lundberg, IDNR

bcc: Denise Roberts, CNSL

RCRA



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MIRP
Hutchison
06/08/12

CNSL
Roberts
06/08/12

MIRP
Johnson
06/08/12

CLH

DR

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Electrolux RFA Work Plan Comments and Responses

May 30, 2012

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Electrolux Response: The Work Plan has been prepared to identify the source(s) and the nature and extent of petroleum and VOC impacts previously detected in site soil and groundwater. If, during the implementation of this Work Order other potential impacts are identified, they will be investigated in a similar manner either during this planned assessment mobilization or during a subsequent mobilization. The remaining comments about the Work Plan Objectives are addressed in Electrolux counsel's letter, dated December 5, 2011.

EPA Response: The response does not provide any information to address the comment.

EPA Comment 2 (General Comment): *The text indicates that nine monitoring wells were installed to assess the shallow (i.e. upper 12 feet) groundwater flow direction. A detailed review of the boring logs indicated that the borings were of insufficient depth to encounter the saturated zone (water table). Thus, the direction of groundwater flow at the site has not been established and the potential impact to groundwater from site activities has not been assessed. Well records in the IDNR GEOSAM database for wells in the vicinity of the site indicate that sand and/or gravel zones exist within the till at various depths but generally at depths of 30 to 60 feet. These coarser-grained materials within the till are very likely to be water-bearing. Monitoring wells must be installed in the uppermost-saturated zone to evaluate the potential impact to groundwater.*

Electrolux Response: To characterize the surficial geology on site, Golder advanced one borehole (GP-01) onsite to an approximate depth of 30 feet below ground surface during the 2010 assessment activities. The surficial geology includes till consisting of a sandy clay to an approximate depth of at least 30 feet below ground surface. Golder did not identify sand or gravel zones within GP-01.

During preparation of the Work Plan, Golder reviewed well logs available on the IDNR GEOSAM database and spoke directly with Mr. Bob McKay, of the Iowa Geological Survey. As stated in the Work Plan (Section 2.1.1, page 4), these findings are consistent with the City of Jefferson 2010 Consumer Confidence Report (CCR) on Water Quality which indicate that the overlying low permeability till material protects the underlying Pleistocene aquifer by reducing migration of contaminants.

Golder did not identify IDNR GEOSAM bore logs for wells installed near the site that indicate the presence of sand or gravel zones within the top 100 feet of the till.

During the 2011 assessment activities, Golder installed monitoring wells within the upper saturated zone of the till materials. Observed depth to groundwater ranged from approximately two to eight feet below ground surface. Golder used industry-standard methods of contouring head elevations to identify shallow groundwater flow directions.

The Work Plan describes how Electrolux intends to define the vertical extent of soil and groundwater impacts using membrane interface probe (MIP), laser-induced fluorescence (LIF) technologies, soil sampling, and groundwater sampling. Golder anticipates that the low-permeability till materials have limited the potential for vertical migration of VOCs. However, should results of the assessment indicate that impacts extend to a greater depth, deeper monitoring wells will be installed, as appropriate.

EPA Response: The statement in the Consumer Confidence Report does not eliminate the need to assess the potential impact to groundwater resulting from previous facility activities. Drilling to a greater depth is required to intercept and assess the groundwater conditions.

EPA Comment 3 (Work Plan Objective): *The additional assessment of soil and groundwater is focused on the southern edge of building. The investigation activities should not be limited to this area but should also include areas where hazardous wastes were generated and stored and also where releases may have occurred. For example, a Site Map (Figure 3) shows the location of a former solvent AST on the west side of the former building. It appears that samples have not been collected in this area. A map figure that shows where hazardous wastes were generated and stored in addition to areas where products were stored should be included in the document. This comment applies to subsequent portions of the document.*

Electrolux Response: As stated in the Work Plan Objectives (Section 1.4) and the MIP/EC and LIF Screening Survey section (Section 3.2), Golder intends to assess soil and groundwater conditions beneath the former building slab including the area of the former solvent storage AST even though, as previously stated, there is no current information to indicate any potential impacts exist at these other areas. Figure 6 provided the initial boring locations to calibrate the MIP/LIF equipment to known concentrations of VOCs and petroleum-impacted soils. Following the calibration step, Golder will advance borings beneath the former building to identify potential source areas and define the nature and extent of soil and groundwater impacts.

EPA Response: Revise Figure 6 to show the location of all planned borings.

EPA Comment 4 (Refinement of the Conceptual Site Model): *The development of a conceptual site model is beneficial; however, according to Figure 3 (Site Map), most of the existing data points are situated in the southern portion of the site. The modeling of large areas based on sparse data points can lead to erroneous interpretations of site conditions and thus, an inaccurate Conceptual Site Model.*

As indicated in a previous comment, none of the borings are of sufficient depth to have intercepted the water table; thus, groundwater data are nonexistent at the present time.

The last statement of this section states that the model will be used to assess the vertical and horizontal extent of soil and groundwater impacts. The extent of soil and groundwater impacts must be based on valid laboratory data. Revise the text to delete this statement.

Electrolux Response: Section 2.0 of the Work Plan provided Golder's current Conceptual Site Model (CSM) based on analytical data obtained during the 2011 assessment activities. As EPA is aware, a CSM should be continually updated as new data are obtained. Golder will revise the CSM following the MIP/LIF survey and the collection of confirmation soil and groundwater laboratory data. The Work Plan includes the collection of up to 60 soil samples from 20 soil borings to confirm the MIP/LIF results and install up to an additional 10 monitoring wells. It is Electrolux's intent to collect an appropriate number of soil and groundwater samples and to analyze the samples using appropriate laboratory methods and QA/QC protocols, such that the CSM can be fully-developed for use on future remedial decisions.

EPA Response: The existing wells are of insufficient depth to intercept the water table. The additional wells that are proposed must intercept the water table.

EPA Comment 5 (MIP/EC and LIF Screening Surveys): *The proposed screening survey is a reasonable approach to determining the presence or absence of chlorinated volatile organic compounds (CVOCs) and petroleum compounds; however, these screening methods are not capable of detecting other constituents such as metals and PCBs. Screening (for CVOCs and petroleum compounds) and/or sampling (for non-volatile constituents) should begin immediately adjacent to each potential source and proceed laterally and vertically based on the results from the initial data points. If extremely high concentrations of contaminants, especially CVOCs and petroleum compounds, are suspected or detected in the subsurface, care should be taken so that a vertical conduit for contaminant migration is not created by pushing the rods through areas where free product may exist.*

Electrolux Response: During the 2011 assessment activities, Golder collected soil samples for laboratory analysis of polychlorinated biphenyls (PCBs) and RCRA-8 metals (i.e., arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver). The laboratory did not detect any PCBs at concentrations above the laboratory reporting limits. The laboratory detected arsenic, barium, chromium, and lead at concentrations above the laboratory reporting limits but at concentrations consistent with background concentrations. Consequently, as described in the May 13, 2011 letter report, metals and PCBs are not considered a constituent of potential concern for the site.

In accordance with our Standard Operating Procedure (SOP) 10 – Borehole Abandonment Procedures, the drilling subcontractor will immediately grout the boreholes advanced through gross contamination.

Grouting the boreholes immediately after they are advanced will reduce the potential for vertical migration of contaminants.

EPA Response: Section 3.3 – Soil Borings and Sampling. On page 10, the text indicates that soil samples will be collected for the analysis of RCRA metals and PCBs.

EPA Comment 6 (Schedule and Reporting): *Revise the text to specify that the complete laboratory data package will be included in the Assessment Report.*

Electrolux Response: The laboratory data package will be included in the assessment report.

EPA Response: Response is acceptable.

EPA Comment 7 (SOP-11 Slug Testing Procedures): *The removal of water from the well with a pump is not recommended, as this method cannot induce an instantaneous change in water level. A solid cylinder should be used as a "slug." A pressure transducer and a data recorder should be used to obtain water level data. Early time data are very important; manual measurements will not provide sufficient early time data.*

Electrolux Response: It is Golder's experience based on previous groundwater sampling and water level measurement activities at the site that groundwater recharge into the monitoring wells is slow. Golder anticipates that the wells will not fully recharge within a 24-hour period and that the volume of water in the 1.5-inch diameter wells can be quickly evacuated using a peristaltic pump. The slow recharge will allow for the collection of water level data using a water level meter. It is Golder's opinion that the slug testing procedures developed for this site are acceptable and will generate valid results. Should materials that are more permeable be encountered, Golder will consider the use of a slug and transducer equipment to complete the slug testing.

EPA Response: As stated previously, the existing wells do not intercept the water table based on the information provided on the boring logs. Wells must be installed to sufficient depth to intercept the water table. Wells that intercept the water table will likely be screened in more permeable materials and recharge will likely be rapid enough that manual water level measurements will not provide adequate data. The method described in the comment is recommended.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

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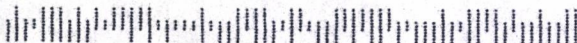
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Atlanta, Georgia 30309-3424

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